

February 9, 2018

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

**RE: Notice of Ex Parte - Misuse of Internet Protocol (IP) Captioned Telephone Service,
Telecommunications Relay Services, CG Docket No. 13-24**

Dear Ms. Dortch:

The purpose of this filing is to provide results from a survey conducted by TEDPA regarding state EDPs processes assessing/evaluating applicant's qualification for its program services and equipment.

Please let us know if you have any questions regarding this filing.

Respectfully Submitted,

James Forstall, TEDPA Liaison for IP-CTS
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www.tedpa.org

Attachment

cc: Via Electronic Mail

TEDPA Board
Karen Peltz Strauss
Eliot Greenwald
Susan Bahr
Michael Scott

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 10:49:03 AM
Last Modified: Wednesday, January 31, 2018 11:37:20 AM
Time Spent: 00:48:17
IP Address: 159.87.117.7

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

We dig into their situation as much as possible when setting up the appointment. Upon meeting with them, talk with them and observe communication skills/body language. Do they look at the phone while you are talking (not needing facial contact) or do they automatically "lip-read" by looking at you. Is the person capable of this process independently? Or are family/friends needed to assist on their behalf. How are their cognitive skills? How is their vision? Do they like to learn new things? Are they open to change their "huh?" habits? Do they want it or is their family TELLING them they need it? We do request the person try an amplified phone because it is in their best interest to be well-informed of all options. Then, even if they are satisfied with an amplified phone, we do have them try out the CapTel, for the same reason. We simulate, as best we can, a variety of voices in regard to speed & clarity. In the end, the client is the one that makes the decision.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

In office: \$50-\$75.

Home visit: \$100-\$200, depending on location in AZ.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Currently, there is not a requirement for this. They can opt to have a demo.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

If the application is signed by one of our eight Certifying Professional categories, we accept that.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

If the met the application requirements, they can choose a device. For most of the state, this is from the catalog. A small portion have face to face demonstrations. Some people need more guidance, and we provide that guidance.

Q6 What type of equipment does a New applicant typically test/demo?

Amplified phones, sometimes CapTel.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

Since they have internet, ideally, an internet based reality check on expectations would be in order. Granted, some users don't use "the computer", so getting them online to do this would not be realistic. Somehow, educating the user on expectations VS. reality is key.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Currently, the representatives of all captioned phones boast "AMPLIFY!! BETTER QUALITY SOUND!! HEARING!! --.....and if you miss something, it has captions." This kind of marketing is intentionally misleading and confuses the end user who has no clue of the cost-per-minute that is involved.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 1:20:11 PM
Last Modified: Wednesday, January 31, 2018 1:29:24 PM
Time Spent: 00:09:12
IP Address: 50.251.147.217

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

To apply for equipment in GA a professional needs to fill out the certificate of need. The professional is the one that verifies the disability.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

The evaluations in GA are completed by a professional.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Once applicants are approved, the GA EDP trainer will test/demo different types of equipment with the new consumer

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

That is already done through our application, with the professional filling out the certificate of need

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

We use the professional's verification from our applications

Q6 What type of equipment does a New applicant typically test/demo?

If hard of hearing we would start with amplified phones, if they cannot hear we would move up to a captioned phone. A captioned phone is the last resort

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

A professional would need to verify the disability. Doctor, audiologist, speech language pathologist...depending on the equipment the consumer is applying for.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Respondent skipped this question

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 1:43:32 PM
Last Modified: Wednesday, January 31, 2018 1:53:38 PM
Time Spent: 00:10:06
IP Address: 198.239.77.118

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

New clients must submit an application form that is signed by an "authorized Professional" that certifies the client has a hearing loss. Unsure of how this would even happen so cannot estimate a timeframe.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

Cost could vary by large amounts. If a person is mobile and can get themselves to a contracted service provider/facility (which we currently do not have), it could be as low as \$50. For clients who are not mobile and require a contractor to go to them, it could range all the way up to \$250 depending on how far the client is from the contractor. This would take into consideration the hourly rate of the contractor and any travel expenses incurred.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

No.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

Without some time to research our options, my first assumption is that we might expand our current requirements. Currently we have an attestation that the professional signs that is fairly generic that states: "Professional must sign the application to certify the hearing loss or speech disability". I would supplement this with a separate document that addresses the fact that there is a cost to the Government for captioning services and that fraudulent activities are subject to penalties. Maybe include something that also states that these approvals will be shared with the FCC. Not sure if we have the authority to do that, but if the FCC gives it to us! :o)

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

Certification by an authorized Professional

Q6 What type of equipment does a New applicant typically test/demo?

Most clients don't test/demo equipment. It's when the trainer gets to the home that we sometimes realize that a captioned phone is not the best fit for the client and they opt for an amplified phone.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

Have strict requirements from certifying professionals and require an attestation to the fact that the person actually NEEDS the captioning feature.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Respondent skipped this question

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, February 02, 2018 9:03:30 AM
Last Modified: Friday, February 02, 2018 10:17:36 AM
Time Spent: 01:14:05
IP Address: 166.67.66.245

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

Contracted providers have staff (aka TAP Specialists) utilizing the Virginia Department for the Deaf and Hard of Hearing (VDDHH) Technology Assistance Program (TAP) questionnaire containing approx. 20 questions regarding lifestyle/everyday communication circumstances. The TAP Specialists ask some or all of the questions based on the clients' responses to the questions. The responses to the questions helps to narrow down the clients' communication needs and selection of appropriate equipment. The assessment process takes approximately 20 minutes on the phone and 45 minutes in person. Assessments can be conducted either by phone or in person or both.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

VDDHH would use formula to calculate costs per assessment as follows (example):

- 1) 40 hours per week x 52 weeks/year = 2080 hours
- 2) \$40k annual salary / 2080 hours = \$19.23/hourly rate
- 3) 4 or 8 hours per appointment x \$19.23/hourly rate = \$76 (4 hours) or \$153.84 (8 hours)

4 hours = in-house appointment is based on prepping the equipment, meeting with the consumer, consulting, completing the application, verifying identification & income, training, entering the application into database, 30 days follow up, reporting and filing.

8 hours = in home appointment (same as 4 hours) plus additional 4 hours to cover travel time and related expenses.

This is the average time/estimated cost to conduct assessment/evaluation and would not be based on actual time because it fluctuates for each appointment among different clients. Some would take longer, some would take shorter time.

However, the caveat is VDDHH DOES NOT pay contractors on hourly rate, rather it is a monthly lump sum payment methodology based on other required deliverables.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes, 14 TAP Specialists (contractors) each have an office with demonstration equipment to conduct testing/demo with clients throughout the Commonwealth of Virginia

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

Based on questionnaire as explained in response to Question 1, not required but some clients bring audiograms (hearing loss) or speech pathologist evaluations (speech disabled), as well as self-disclosure on required application form.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

Same as #1, the questionnaire helps narrow down the communication needs for different circumstances in workplace, home, public, and telecommunication infrastructure. As a result, the TAP distribute equipment to accommodate their communication needs in these environments.

Q6 What type of equipment does a New applicant typically test/demo?

Depending on the clients' needs in different environments, clients would test/demo personal FM system, various types of signalers and alarms, amplified & captioned telephones, other specialized telecommunication equipment, blue tooth technology.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

Each state has various statutes, regulations, practices concerning their EDPs. Accordingly, FCC should allow broad flexibility in states' abilities to develop and manage its' own programs' infrastructure as opposed to requiring limited and one-size-fit-all, mandate and approach, as it did with the national NDBEDP requirements.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Not all states have contractors or offices to assess/evaluate clients or demo/test equipment. Virginia is a unique state to offer a 'loan-to-own' program where clients have 30 days to experiment with the equipment and decide whether to accept ownership or return and exchange the equipment for another type of equipment. It reduces the potential for future problems with the assignment of incompatible equipment.

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, February 02, 2018 10:12:21 AM
Last Modified: Friday, February 02, 2018 11:32:59 AM
Time Spent: 01:20:37
IP Address: 72.175.79.158

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

1) Schedule appointment 2) Drive to their residence/office visit 3) One on one conversation for hearing assessment/ try different equipment out with them/ assess internet connection capabilities/ try to involve a contact person/ assess mental and vision capabilities also(using captions is harder)

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

We estimate \$100.00 due to rural distances and including hotel possibilities, staff time, and vehicle expenses.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes, maybe not EACH type, but until we find a fit.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

Same answer as #1 question

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

Application info, verifier references, contact persons, and results of trial equipment tests

Q6 What type of equipment does a New applicant typically test/demo?

Depends on the disability, but concerning hearing loss: amp phone/speakerphone/caption phone/neckloop/headsets

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

Same as question #1 for states that have travel ability- that's where the problem will lie- many states don't have that access. So would still recommend some type of one on one reference person along with medical documentation.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Each state will be different due to the different styles of distribution- so be careful that any regulations/requirements don't make it impractical or impossible to do because they may not be allowed to do them, either fiscally, or because of how their program is set up.

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 3:17:20 PM
Last Modified: Monday, February 05, 2018 3:52:12 PM
Time Spent: 00:34:52
IP Address: 65.124.199.186

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

Applicants are assessed for eligibility through a qualification process that requires individuals to complete an application with a third party certification.

Qualifications are based on three criteria, 1) age, 2) legal residency of state, and 3) certified hearing loss or speech disability.

The average assessment time ranges from 30 minutes to one hour, or longer (depending on selected equipment). This assessment process includes reviewing and verifying application for completion and accuracy, evaluating (testing) client on different types of equipment, and training on selected equipment.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

\$50-\$100. Cost to provide additional services for IP-CTS should be considered by the FCC as well.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes, all staff/contractors are authorized professionals. Each regional distribution center is equipped with all devices/equipment for applicant to evaluate/test.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

Applicants are required to complete an application attesting to age, proof of legal residency, and certified by a Approved Certifier as listed in state statute. These are licensed physician; audiologist; hearing aid specialist; deaf service center director; speech pathologist; appropriate state agency serving deaf or hard of hearing or speech disability, deaf/blind; appropriate federal agency serving deaf, hard of hearing or speech; disability; and, state certified teacher of deaf, hard of hearing or speech disability.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

Each qualified applicant will evaluate/test appropriate equipment that best meet their needs. An authorized professionals assist applicant by describing the equipment features and evaluate/test using a pre-recorded voice tester (both man and woman's voice) and/or phone simulator.

Q6 What type of equipment does a New applicant typically test/demo?

Although many different types of equipment is offered, the majority of qualified clients selected amplified telephone. The two most popular in our state are XLC3.4 and Alto.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

The simpler the FCC's process can remain to each state's existing process the better. Even though each state have their own unique process, the majority of the information and processes should sufficiently accommodate FCC's request for assessing IP-CTS applicants.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

State EDPS are willing to work with the FCC on this subject matter and already have infrastructure in place to satisfy the majority of FCC concerns. Keep it as simple as possible.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 4:59:32 PM
Last Modified: Monday, February 05, 2018 5:07:41 PM
Time Spent: 00:08:08
IP Address: 165.189.9.84

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

We do not conduct assessments.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

We would partner with another state agency or agencies for such evaluations, so we would not have an estimate of cost without their input.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes, but not in our offices. We have authorized demo and loan sites (like at Independent Living Centers) around the state.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

We would have to prtnr with other state agencies for this assessment.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

We allow self-certification of needed equipment.

Q6 What type of equipment does a New applicant typically test/demo?

Amplified phones, bluetooth streamers, tablets, personal amplifiers, and signalers.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

With a cost ceiling on federal reimbursement, let each state make its plan for how to meet the federal evaluation requirments.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Respondent skipped this question

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 4:30:03 PM
Last Modified: Monday, February 05, 2018 5:08:23 PM
Time Spent: 00:38:20
IP Address: 159.238.192.20

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

Wyoming's equipment application ask clients a number of questions. The responses help narrow the focus of the assessment/evaluation.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

\$50-\$150 without travel expenses.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Sometimes. Testing/demo is not required to receive equipment. It is arranged by request if either the applicant and/or the State personnel are uncertain of the equipment most appropriate for the applicant. The testing/demo may take place at the state office or at the applicants home or other location.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

To be eligible to receive equipment the applicant must be:

Deaf, Deaf-Blind, Speech-Impaired, or Hard of Hearing; a resident of Wyoming; able to understand the nature and use of the equipment; and meet the financial requirements (income at or above 200% of federal poverty level). Eligibility is determined by self-certification signed by the applicant. Additionally applicants are required to sign a release of information for an appropriate healthcare provider who can verify their hearing loss or speech-impairment. The State only seeks this information if concerns existed about the applicants eligibility. In most cases, the program staff are able to determine that the applicant has a hearing loss or speech disability through the application and through their interactions with the applicant.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

Please see above for the criteria. The type needed is based on informed choice of the applicant and through demonstration and assessment when requested and/or needed.

Q6 What type of equipment does a New applicant typically test/demo?

Amplified telephones (corded, cordless), captioned telephones, signaling equipment, wireless equipment, TTY's, etc. It is really based on their needs.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

There are many variables impacting the answer to this question. Wyoming is a large rural state with a small staff. We work hard to provide thorough and objective information on the pros and cons of all available equipment and services before equipment is distributed. We utilize the answers to the questions on the application, and the self-certification to limit the number of actual in-person demos/assessments. It would be both logistically and financially difficult as well as unnecessary to do in-person assessments on all applicants. Also keep in mind we have a number of repeat applicants. Most likely their hearing loss or speech disability has not improved thus if they previously received a captioned telephone and they are requesting a new one an assessment is most likely not needed.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Respondent skipped this question

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 9:06:55 AM
Last Modified: Tuesday, February 06, 2018 9:25:13 AM
Time Spent: 00:18:17
IP Address: 136.234.105.212

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

We'll assess the client's use of the amplified phone first before trying out a captioned telephone. We test on the use of the equipment. Depending on the need for a landline, cordless or wireless phone, it can take anywhere from an hour to an hour and a half for the assessment.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

In the office - \$100

In client's home depending on location - \$150-250

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Depends on the client's needs. They may test the various equipment with the EDP staff at the office. Out at their home, they may test a few devices depending on their needs, what kind of phone line service they have, where the jacks and power outlets are, etc.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

We receive a Certification of Impairment form the client's audiologist or other professional has signed that was sent along as part of our application process. Some medical papers may be attached to the application showing proof of disability.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

We ask applicant or their contact person many questions. What kind of struggles the person has now with using the phone? Are they able to hear the phone ring? How is it when they are on the phone? Are they understanding what is said on the phone? Do they wear hearing aids? How is it with holding onto the handset? What kind of phone line do they have? Are they looking for a cordless, amplified phone? Do they struggle and may need a captioned phone but may need to try out our strong amplified phone first may do the trick, if not we provide the captioned phone and show how it works.

Q6 What type of equipment does a New applicant typically test/demo?

They will test the CSC600, XLC3.4 or XLC2, BT914 if they need to pair their own cell phone to it. Or, they may try a neckloop 4Lite with their cell phone.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

I don't think EDP staff have time to sign off on Cert of Impairment forms when we receive them from professionals already. If assigned to states, they should push for audiologists, speech pathologists and other professionals to sign off on the forms, not EDP staff. The Arizona program already has a legislative process where hearing aid professionals are required to share information about the AZ TED Programs, how can that work across other states to have the same requirements.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

I think there's third party evaluations that aren't part of EDP's that are easily approving clients for a captioned phone when they don't need one.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:40:10 AM
Last Modified: Tuesday, February 06, 2018 12:01:06 PM
Time Spent: 00:20:56
IP Address: 162.114.43.84

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

KY consumers are asked to consult with their hearing loss professional to determine the best equipment for their particular hearing loss. We also have 8 demonstration cabinets across the state where consumers can go to TEST the equipment before selection. Each cabinet is located in a center where professionals that work with other consumers with a hearing loss can assist in testing the equipment with our applicants.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

Estimate \$75-\$100 of staff time to conduct the assessment/evaluation on applicants. To outsource would most likely be in the \$200 range for each applicant due to overhead costs.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes, all applicants have this opportunity. Either at our office by our staff, or at one of 8 other sites with professionals that are partners with our EDP. However, the consumer is not required to test the equipment if the hearing loss professional recommends a specific device for that applicant.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

Currently KY requires a signature or letter from an audiologist, hearing instrument specialist, private physician (must be primary doctor), advanced practice registered nurse, physician assistant, speech language pathologist or otolaryngologist to verify the applicants hearing loss.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

deaf, hard of hearing, speech impaired or low vision WITH a hearing loss also. Resident of KY for 1 year. Minimum age 5. Verify telephone or internet service as appropriate. The applicant and his/her professional determine the type of equipment desired.

Q6 What type of equipment does a New applicant typically test/demo?

Most often in KY consumers come to one of our testing sites to use amplified/speech/ER and CapTel phones to see which would serve them best. Occasionally, someone may test a wireless device or TeleTalk to see if they are able to use it productively.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

In a perfect world, if IP-CTS is transferred to state EDP's then additional funding would also follow. Funds would be utilized to hire a staff person to do testing for ALL CapTel applicants across the state, which would require a lot of traveling and would slow down the approval process. If funds are not added, then its questionable if full assessments could be done and we would have to go with our current system of relying on the professional verifying the hearing loss to select the correct device.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

KY is NOT interested in assuming the function of assessing or evaluating each CapTel applicant. We have reports from our Relay provider that indicate there is very little fraud happening in regards to IP-CTS services. Other than a few incidents in the prison system, which were terminated immediately upon recognition, we do not see misuse of IP-CTS as a problem in our state.

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 07, 2018 8:00:58 AM
Last Modified: Wednesday, February 07, 2018 8:12:04 AM
Time Spent: 00:11:05
IP Address: 170.154.182.201

Page 1: TEDPA IP-CTS Questions

Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

Massachusetts conducts all accessments in the applicants home. Mass EDP creates a two hour window for each appointment but the estimated time for a Caption phone install is about 45 min to an hour.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

estimate between \$75-\$150

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Some applicants will come to the office but most are done at the applicants home

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

That is done by a liscenced Massachusetts Physician

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

1. Applicants disability
2. In home accessment

Q6 What type of equipment does a New applicant typically test/demo?

Would depend on their disability and needs

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

Respondent skipped this question

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Respondent skipped this question

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 07, 2018 10:46:17 AM
Last Modified: Wednesday, February 07, 2018 11:37:40 AM
Time Spent: 00:51:23
IP Address: 129.237.108.147

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Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

Persons eligible for the Kansas Telecommunications Program could come to one of the AT Access Sites located across the state at any time and receive a functional demonstration of equipment that would meet their needs. The program has ten sites across the state to provide timely access. If the individual is unable to travel to the Site an appointment would be made to meet the consumer in their home. The range of wait time is anticipated to be from 0-5 days. The average time is estimated to be 2 days.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

The cost of conducting a functional demonstration would need to consider the location of the demonstration (in center vs. at the individual's home so travel would be necessary), staff time, requirements regarding wait time for conducting demonstrations (clustering demonstrations could reduce travel costs), and if additional interpreters are needed. An estimated range would be \$175 - \$225.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes, that would be the model that Kansas would propose. A guided functional demonstration help consumers make an informed choice.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

To be eligible for the Kansas EDP the individual must have a professional sign the application certifying that the individual's disability interferes with the individual's ability to use traditional telecommunication services. Eligibility for the program would stay the same. We would be adding the functional demonstration and consideration of equipment to IP-CTS equipment distribution.

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

The first step is that a certifying professional has stated that the individual has a disability--hearing, vision, communication, cognitive impairment, or fine motor impairment-- that is interfering with the use of traditional telecommunication. Personal income of \$55,000 or less, residency in the state, and not receiving equipment from the program in the past four years unless the severity of the disability has changed are the other eligibility requirements. If these four requirements are met then the individual works with an AT equipment specialist to help identify the equipment that meets their individual need. A demonstration of equipment options is encouraged to help determine the optimal equipment that matches the individual and living environment.

Q6 What type of equipment does a New applicant typically test/demo?

A new applicant tries a full range of amplified phones, caption phones, signal systems, mobile technology, and peripherals needed for access.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

After the barrier to using traditional telecommunication has been identified, a functional demonstration of at least three devices meeting the consumer's needs would occur. A knowledgeable, unbiased professional would conduct the demonstration and would be able to discuss the pros and cons of the devices being demonstrated with the individual.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

Kansas TAP feels strongly that a functional demonstration conducted by unbiased professionals needs to occur regarding the distribution of IP-CTS equipment. Without the addition of this component, the sustainability of the program is in jeopardy.

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 08, 2018 1:20:42 PM
Last Modified: Thursday, February 08, 2018 1:28:04 PM
Time Spent: 00:07:22
IP Address: 206.174.41.21

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Q1 Please describe your state's EDP process if you were asked to conduct an assessment/evaluation on a New applicant. Also, please state the average time it may take to conduct such an assessment/evaluation.

We make an appointment and provide a demonstration of equipment and have the client try the devices. The average time it takes to meet with them is one hour.

Q2 What would the average cost to your EDP be if you were asked to conduct an assessment/evaluation on a New applicant? If you're uncertain of the exact amount, please provide an estimated range (i.e. \$50 - \$75 or \$200-\$225).

Including the time to demonstrate the devices and help them complete the application it could range between \$75-\$150. This is if they meet us in our office at a central location. If they meet us while we are out travelling, it could cost more due to the cost of travel. In the case of travelling to remote areas, the cost would be \$200-225.

Q3 Do New applicants test/demo each different types of equipment in your office/location in front of an authorized professional (EDP staff person or contractor)?

Yes.

Q4 How would your state EDP assess/evaluate a New applicant's qualification/eligibility (i.e. hearing loss, speech disability, etc.)?

A certification must be signed by a qualified professional (audiologist, other hearing professional, doctor, speech language therapist, etc)

Q5 What criteria do you use in determining whether a New applicant needs assistive technology and the type needed?

This is a very general question. Assistive Technology has a broad range of items. If we are talking specifically about the EDP, we meet with the individual to discuss their need which, in this case, is access to telecommunications. We then determine which program would be appropriate based on their disability. If they are deaf-blind, we might refer them over to the federal iCanConnect program. If they have hearing loss or speech difficulty, and have a landline phone we would refer them to the state program. We would then demonstrate appropriate devices and to help the consumer pick the device that will best fit their needs. We use a method of feature matching and consumer choice.

Q6 What type of equipment does a New applicant typically test/demo?

In our State EDP, it is the equipment that is available in the program which is amplified phones and Captel Captioned phones for landlines.

Q7 Based on your professional experience, what would be your recommendation to the FCC on how an assessment/evaluation should be conducted if the FCC transitioned the IP-CTS to state EDPs?

A demonstration and trying out the equipment should be required. In our experience, many people think they might need a captioned phone but their hearing loss may not necessitate it. They try out the amplified phone and it is a better fit.

Q8 Please feel free to provide any other comments, recommendations, or concerns with regard to the assessment/evaluation process the FCC should be aware of.

It is concerning that in some states the vendor is promoting their IP-Captel and the third party certification aggressively and not working with the state programs. It is also concerning that there are some states led by TRS vendors who are aggressively promoting IP-Captioned phones instead of more appropriate equipment through the state program.